

1. This Agency has reviewed the OMB circular on parking and provides comments in the general sense of overall policy and a few peculiar issues faced by CIA. The CIA fully supports the President's program aimed at the conservation of energy resources. We have for many years operated a vigorous carpooling program providing prime parking to carpools.

2. The intent of parking fees is to reduce travel and thereby conserve energy and is not established as a revenue matter. Use of carpools and public transportation are the major means of travel conducive to energy savings. This means of travel is reasonable for personnel assigned to Agency facilities located in the downtown area but results in serious drawbacks for personnel working in lightly populated suburban areas. As such, while the Agency supports parking fees as a realistic means of achieving the goals for densely populated areas, such fees become a punitive measure in lightly populated suburban areas, particularly since there are no commercial equivalents in the area. In these areas, prior U.S. Government/local community planning has created extensive parking areas. Charging for such space will drive employees into the neighborhood areas, which have adequate off-street parking, resulting in harassment and little or no conservation of energy. For most of our employees, there is no adequate public

transportation available to and from their homes. Carpools are difficult to arrange to meet varying work schedules and frequent requirements to work extended hours. In effect, most of our suburban employees do not have an option. Use of a private vehicle is essential.

3. The Agency has a peculiar problem as relates to personnel identity and the cover story under which many of our employees live their daily lives. Personnel under cover are not free to regularly ride public transit to an openly identified CIA facility. In addition, if they avail themselves of carpools, this too must take in cover considerations.

4. One major issue of concern presented in the circular relates to the administration of the parking fee program. Costs and the administrative burden associated with the program will be extensive and in this age of tight budgetary restrictions cannot be absorbed without serious impact. For this Agency, security and cover considerations must be added to normal burdens of fee collection, issuance of permits, and space assignment. Because of matters of security and cover, this Agency must administer the program internally or employ a fully cleared contractor force. The latter, a poor substitute, is a continuing problem as contractor personnel turn over, and security clearance and associated costs continue. It is clear that this Agency will be required to dedicate full-time personnel to the management of the program.

5. While this Agency supports parking fees as a reasonable program to reach these established goals, it will only be effective and fair when applied to areas properly served by public transportation. Even at that, this Agency's peculiar cover and security problems present other areas of concern.

6. We wish to thank you for the opportunity to comment on the proposed circular and would be pleased to discuss the matter in detail at your convenience.